

**ZACHAR LAW FIRM, P.C.**

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*Attorney for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

Houston Specialty Insurance Company,

Plaintiff,

vs.

Leah Rekowski, et. al.,

Defendant.

No. 2:23-cv-01187-JZB

**DEFENDANT LEAH REKOWSKI'S  
ANSWER TO PLAINTIFF'S  
AMENDED COMPLAINT IN  
INTERPLEADER**

Defendant Leah Rekowski submits her Answer to the Amended Complaint for Interpleader [Doc 5].

**ADMISSIONS/DENIALS**

For her answer to the individually numbered paragraphs of the Amended Complaint for Interpleader, Leah states the following:

**PARTIES**

1. Leah is without sufficient knowledge as to the allegations in this paragraph and therefore denies same.

2. Leah is without sufficient knowledge as to the allegations in this paragraph and therefore denies same.

1           3. Leah is without sufficient knowledge as to the allegations in this paragraph  
2 and therefore denies same.

3  
4           4. Leah is without sufficient knowledge as to the allegations in this paragraph  
5 and therefore denies same.

6  
7           5. Leah is without sufficient knowledge as to the allegations in this paragraph  
8 and therefore denies same.

9  
10          6. Leah is without sufficient knowledge as to the allegations in this paragraph  
11 and therefore denies same.

12  
13          7. Leah is without sufficient knowledge as to the allegations in this paragraph  
14 and therefore denies same.

15           8. Leah admits that she is a resident of Lee County Georgia. She denies the  
16 remaining allegation and affirmatively asserts that she is not the biological mother of K.R.  
17 and C.R.

18  
19  
20          9. Leah is without sufficient knowledge as to the allegations in this paragraph  
21 and therefore denies same.

22  
23          10. Leah is without sufficient knowledge as to the allegations in this paragraph  
24 and therefore denies same.

25          11. Leah is without sufficient knowledge as to the allegations in this paragraph  
26 and therefore denies same.

27          12. Leah is without sufficient knowledge as to the allegations in this paragraph  
28 and therefore denies same.

1           13.    This paragraph does not state contain any allegations and does not require a  
2 response.  
3

4           14.    Admit.

5           15.    Admit.

6  
7           16.    This paragraph does not state contain any allegations and does not require a  
8 response.  
9

10          17.    Leah is without sufficient knowledge as to the allegations in this paragraph  
11 and therefore denies same.

12          18.    Admit. Leah affirmatively asserts that she is without knowledge as to  
13 whether Cosmos Express, Inc. has any other applicable insurance policies.

14          19.    While Leah is without sufficient knowledge as to the allegations in this  
15 paragraph, she has not evidence that contradicts this assertion and admits same.  
16

17          20.    Leah admits that that Mr. Campo was traveling eastbound on the I-10  
18 freeway, crossed the median and struck a vehicle being driven by Leah Rekowski. She  
19 also admits that it led to her personal injuries, the death of her spouse and property damage.  
20 She is without sufficient knowledge as to the remaining allegations and therefore denies  
21 same.  
22

23          21.    Leah is without sufficient knowledge as to the allegations in this paragraph  
24 and therefore denies same  
25  
26  
27  
28

1           22. Leah admits that she sustained personal injuries as a result of this accident.  
2 Leah is without sufficient knowledge to answer for the remaining parties and therefore  
3 denies same.  
4

5           23. Admit.  
6

7           24. Leah admits that she filed on behalf of herself and K.R. and C.R., but denies  
8 that they are her children. Leah admits the remaining allegations.  
9

10          25. Leah is without sufficient knowledge as to the allegations in this paragraph  
11 and therefore denies same.  
12

13          26. Leah admits that the Notice of Claim contained a sum certain amount to  
14 settle all claims for \$17.5 million. Leah denies the remaining allegations.  
15

16          27. Leah is without sufficient knowledge as to the allegations in this paragraph  
17 and therefore denies same.  
18

19          28. Leah is without sufficient knowledge as to the allegations in this paragraph  
20 and sub-parts and therefore denies same.  
21

22          29. Leah is without sufficient knowledge as to the allegations in this paragraph  
23 and sub-parts and therefore denies same.  
24

25          30. Leah is without sufficient knowledge as to the allegations in this paragraph  
26 and therefore denies same.  
27

28          31. Leah is without sufficient knowledge as to the allegations in this paragraph  
and therefore denies same.

1           32. Leah admits that counsel for multiple entities sent a letter dated January 27,  
2 2023, re: the resolution of claims concerning a policy held by Cosmos Express. Leah  
3 denies any remaining allegations.  
4

5           33. Leah is without sufficient knowledge as to the allegations in this paragraph  
6 and therefore denies same.  
7

8           34. Leah is without sufficient knowledge as to the allegations in this paragraph  
9 and therefore denies same.  
10

11           35. Leah is without sufficient knowledge as to the allegations in this paragraph  
12 and therefore denies same.  
13

14           36. Leah is without sufficient knowledge as to the allegations in this paragraph  
15 and therefore denies same.  
16

17           37. Leah is without sufficient knowledge as to the allegations in this paragraph  
18 and therefore denies same.  
19

20           38. Leah is without sufficient knowledge as to the allegations in this paragraph  
21 and therefore denies same.  
22

23           39. Leah is without sufficient knowledge as to the allegations in this paragraph  
24 and therefore denies same.

25           40. Leah is without sufficient knowledge as to the allegations in this paragraph  
26 and therefore denies same.

27           41. Leah is without sufficient knowledge as to the allegations in this paragraph  
28 and therefore denies same.

42. Leah is without sufficient knowledge as to the allegations in this paragraph and therefore denies same.

A. That Leah Rekowski be awarded the following for damages *she suffered* as a result of her injuries, including but not limited to the following: (1) Her medical bills, past, present and future; (2) past and future lost income; (3) pain, suffering and loss of enjoyment of life; and (4) All other economic and pecuniary damages due to her injuries.

C. Costs incurred in accordance with A.R.S. § 12-1840; and

DATED this 18th day of September, 2023.

/s/ Ben R. Jemsek

Ben R. Jemsek

Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th of September, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following parties/counsel of record:

Gena L. Sluga  
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/s/ Jena Smanz